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December 18, 2008

VIA ECF

The Honorable John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

Re: United States v. David Heyman, et al., 07-CR-69 (JG)

Dear Judge Gleeson:

With the consent of the government, we write to request modification of David Heyman's supervised release conditions to permit him to travel in the United States, within the 48 contiguous states, without prior approval from the Court. Currently, Mr. Heyman's supervised release conditions permit unrestricted travel within the district of his supervision, the District of New Jersey. Mr. Heyman has also been permitted by his U.S. Probation Officer to travel to Manhattan on a daily basis for work. The reason for this request is to enable Mr. Heyman to travel more extensively for work and to visit family members in other parts of the country without submitting an application to the Court each time. We have spoken with Assistant United States Attorney Sean Casey, who consents to this request.

Mr. Heyman served the 15-month sentence imposed by the Court without incident, successfully completed 3 months in a halfway house, and has been doing the 400 hours of community service imposed by the Court as part of his sentence at Friends of Island Academy, the same place Mr. Heyman volunteered pre-sentencing. He also settled his related case with the United States Securities and Exchange Commission and paid disgorgement in that matter. Mr. Heyman is doing well on supervised release. He is employed in the finance department at Quality Building Services, 801 Second Ave., New York, NY, where his employer is aware of his legal situation. It would assist his job performance if Mr. Heyman could travel outside of his approved district for work on short notice. In addition, Mr. Heyman's brother lives in Virginia and his longtime girlfriend's parents live in Connecticut. Mr. Heyman would like to be able to

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visit them without burdening the Court with an application each time. In the alternative, if the Court will not permit travel within the 48 contiguous states, we request that Mr. Heyman's supervised release conditions be modified to permit travel within New York, New Jersey, and Connecticut, without obtaining prior Court approval.

We thank the Court for its consideration.

Respectfully submitted,

Renato C. Stabile

cc: Sean Casey, Esq.
Assistant United States Attorney
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Susan Karlak
United States Probation Officer
(by fax to: 973-357-4092)